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UNITED STATES OF AMERICA

v.

LEIBNIZ DIAZ,  
a/k/a "Adaid Roman Vega,"

Defendant

CRIMINAL NO. 24-Cr-00157-PX

(False Statement in Application for  
Passport, 18 U.S.C. § 1542; Forfeiture,  
18 U.S.C. § 982(a)(6), 21 U.S.C.  
§ 853(p), 28 U.S.C. § 2461(c))

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INFORMATION

COUNT ONE  
(False Statement in Application for Passport)

The United States Attorney for the District of Maryland charges that:

On or about October 31, 2022, in the District of Maryland and elsewhere,

the defendant,

LEIBNIZ DIAZ,  
a/k/a "Adaid Roman Vega,"

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, the defendant signed and submitted a completed Department of State Form DS-82 (Passport Application Renewal by Mail) which contained false information regarding his identity, nationality, place of birth, parental history, social security number, and date of birth.

18 U.S.C. § 1542

**FORFEITURE ALLEGATION**

The United States Attorney for District of Maryland further alleges that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(6), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of the defendant's conviction under the offense alleged in Count One of this Information.
2. Pursuant to 18 U.S.C. § 982(a)(6), upon conviction of the offense set forth in Count One of this Information, the defendant,

**LEIBNIZ DIAZ,  
a/k/a "Adaid Roman Vega,"**

shall forfeit to the United States:

- a. Any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and
- b. Any property real or personal that constitutes, or is derived from or traceable to the proceeds obtained directly or indirectly from the commission of the offense, or that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

**Substitute Assets**

3. If any of the property described above, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

5/13/24  
Date

Erek L. Barron /Aha  
Erek L. Barron  
United States Attorney